



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**REGION IX**

**75 Hawthorne Street**

**San Francisco, CA 94105-3901**

September 18, 2008

Robert Montana  
SEIS Project Manager (Code ROPME.RM)  
Naval Facilities Engineering Command Southwest  
2730 McKean St., Building 291  
San Diego, CA 92136

Subject: Draft Supplemental Environmental Impact Statement (DSEIS) for developing homeport facilities for three Nimitz-class aircraft carriers in support of the U.S. Pacific Fleet, Coronado, California (CEQ # 20080303)

Dear Mr. Montana:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA) Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act.

The Draft Supplemental Environmental Impact Statement (DSEIS) supplements the 1999 Final EIS with information relevant to environmental conditions that have emerged since the 2000 Record of Decision (ROD). Specifically, the DSEIS focuses on vehicular traffic and traffic-related issues around the Naval Air Station North Island (NASNI) in Coronado, California from an expected increase in the average number of intermittent nonconsecutive days each year (from 13 to 29) that the 3 nuclear powered aircraft carriers (CVNs) would be homeported simultaneously. The DSEIS also addresses impacts from minor CVN berth infrastructure improvements and potential shoreline erosion along First Street in Coronado.

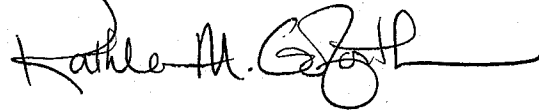
Based on our review, we have rated the DEIS as Lack of Objections (LO) (see enclosed "Summary of Rating Definitions"). The DSEIS acknowledges that NASNI contributes significantly to average traffic volumes in the area; however, monitoring of the mitigation measures implemented from the 2000 ROD shows that these measures have been effective in reducing peak and total traffic on the local and regional road network. These measures include staggering of work schedules, encouraging car- and vanpools, and subsidizing public transit. The Navy's Transportation Incentive Program (TIP) has been utilized by over 1,300 commuters or approximately 6% of Navy and civilian employees and has been recognized with an award by the San Diego Area Association of Governments. EPA encourages the Navy to continue to provide transit incentives and encouragement to further increase TIP users. We also commend the Navy for identifying potential external traffic improvements that could reduce traffic impacts substantially, and its willingness to pursue Department of Defense funding should these

improvements be approved by the City of Coronado and Caltrans.

The proposed minor infrastructure improvements will include removal of the top concrete and asphalt surface of the quaywall for replacement. The Navy should implement mitigation measures to ensure that this material does not enter the marine environment during removal activities. We commend the Navy for proposing drainage improvements, including a below-surface sand filter to remove metals and a wet well and sump pump to allow capture and cleaning of the first quarter inch of rainfall. These improvements will help prevent water quality degradation.

EPA appreciates the opportunity to review this DSEIS. When the FSEIS is released, please send one hard copy (without appendices) and one CD to this office at the above address (mail code: CED-2). If you have any questions, please contact me at 415-972-3521 or Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or [vitulano.karen@epa.gov](mailto:vitulano.karen@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth", with a long horizontal flourish extending to the right.

Kathleen M. Goforth, Manager  
Environmental Review Office (CED-2)

Enclosure: Summary of EPA Rating Definitions

## **SUMMARY OF EPA RATING DEFINITIONS**

This rating system was developed as a means to summarize EPA's level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the EIS.

### **ENVIRONMENTAL IMPACT OF THE ACTION**

#### ***"LO" (Lack of Objections)***

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### ***"EC" (Environmental Concerns)***

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### ***"EO" (Environmental Objections)***

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### ***"EU" (Environmentally Unsatisfactory)***

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

### **ADEQUACY OF THE IMPACT STATEMENT**

#### ***Category 1" (Adequate)***

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### ***"Category 2" (Insufficient Information)***

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### ***"Category 3" (Inadequate)***

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."